

[All counsel listed on sig. page]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

GRANT HOUSE, *et al.*,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC  
ASSOCIATION, *et al.*,

Defendants.

No. 4:20-cv-03919 CW

**JOINT STIPULATION AND  
[PROPOSED] ORDER  
CONSOLIDATING *HOUSE* AND  
*OLIVER* ACTIONS**

TYMIR OLIVER, *et al.*,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC  
ASSOCIATION, *et al.*,

Defendants.

No. 4:20-cv-04527 CW

WHEREAS, the case entitled *House, et al. v. National Collegiate Athletic Conference, et al.* (the “*House* action”) was filed in this District on June 15, 2020 (ECF 1) and assigned to the Honorable Claudia Wilken on June 30, 2020 (ECF 15);

WHEREAS, the case entitled *Oliver v. National Collegiate Athletic Conference, et al.* (the “*Oliver* action”) was filed in this District on July 8, 2020 (ECF 1) and assigned to the Honorable Claudia Wilken on July 22, 2020 (ECF 11);

WHEREAS, the *House* and *Oliver* actions involve similar factual allegations and seek to hold the same Defendants liable for their alleged anticompetitive conduct, the Plaintiffs bring their respective claims under similar statutes or theories, and the Plaintiffs seek to represent the same or similar class(es);

WHEREAS, in the interests of efficiency, consistency, and judicial economy, all parties in the above-captioned matters wish to provide for: (1) the consolidation of the actions that have been filed in this District and any actions raising substantially similar claims or defenses that will be filed in or transferred to this District, and (2) the filing of a consolidated amended complaint;

THE PARTIES, THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE, SUBJECT TO COURT APPROVAL, THAT:

1. Pursuant to Fed. R. Civ. P. 42(a)(2), the *House* and *Oliver* actions, and all class actions subsequently filed in or transferred to this District raising substantially similar claims or defenses are hereby consolidated;

2. The Plaintiffs shall file a consolidated amended complaint on or before July 26, 2021; and

3. All papers filed in the consolidated action shall be captioned *In re College Athlete NIL Litigation*, No. 4:20-cv-03919 CW.

The parties agree to comply with this Stipulation and Order pending the Court’s approval.

1  
2 Dated: July 14, 2021

**HAGENS BERMAN SOBOL SHAPIRO  
LLP**

3 By: s/ Steve W. Berman

4 Steve W. Berman (*pro hac vice*)  
5 Emilee N. Sisco (*pro hac vice*)  
6 1301 Second Avenue, Suite 2000  
7 Seattle, WA 98101  
8 Telephone : (206) 623-7292  
9 Facsimile: (206) 623-0594  
10 steve@hbsslaw.com  
11 emilees@hbsslaw.com

12 Benjamin J. Siegel (SBN 256260)  
13 715 Hearst Avenue, Suite 202  
14 Berkeley, CA 94710  
15 Telephone: (510) 725-3000  
16 Facsimile: (510) 725-3001  
17 bens@hbsslaw.com

Attorneys for Plaintiffs and the Proposed Classes

18  
19 Dated: July 14, 2021

**WILKINSON STEKLOFF LLP**

20 By: s/ Beth A. Wilkinson

21 Beth A. Wilkinson (*pro hac vice*)  
22 Rakesh N. Kilaru (*pro hac vice*)  
23 Kieran Gostin (*pro hac vice*)  
24 Calanthe A. Cope-Kasten (*pro hac vice*)  
25 2001 M Street NW, 10<sup>th</sup> Floor  
26 Washington, D.C. 20036  
27 Telephone: (202) 847-4000  
28 Facsimile: (202) 847-4005  
bwilkinson@wilkinsonstekloff.com  
rkilaru@wilkinsonstekloff.com  
kgostin@wilkinsonstekloff.com  
ccope-kasten@wilkinsonstekloff.com

JOINT STIPULATION AND [PROPOSED] ORDER CONSOLIDATING *HOUSE* AND *OLIVER* ACTIONS

No. 4:20-cv-03919-CW

No. 4:20-cv-04527-CW

Rahul Hari (SBN 313528)  
WILKINSON STEKLOFF LLP  
11601 Wilshire Blvd., Suite 600  
Los Angeles, CA 90025  
Telephone: (425) 291-9655  
Facsimile: (202) 847-4005  
rhari@wilkinsonstekloff.com

Attorneys for Defendant National Collegiate  
Athletic Association

Dated: July 14, 2021

**PROSKAUER ROSE LLP**

By: s/ Scott P. Cooper

Scott P. Cooper (SBN 96905)  
Bart H. Williams (SBN 134009)  
Kyle A Casazza (SBN 254061)  
Shawn S. Ledingham, Jr. (SBN 275268)  
Jennifer L. Jones (SBN 284624)  
Kelly M. Curtis (SBN 313581)  
2029 Century Park East, Suite 2400  
Los Angeles, CA 90067  
Telephone: (310) 557-2900  
Facsimile: (310) 557-2193  
bwilliams@proskauer.com  
scooper@proskauer.com  
kcasazza@proskauer.com  
sledingham@proskauer.com  
jljones@proskauer.com  
kcurtis@proskauer.com

Attorneys for Defendant Pac-12 Conference

Dated: July 14, 2021

**MAYER BROWN LLP**

By: s/ Britt M. Miller

Britt M. Miller (*pro hac vice*)  
Matthew D. Provance (*pro hac vice*)  
71 South Wacker Drive  
Chicago, IL 60606  
Telephone: (312) 782-0600

JOINT STIPULATION AND [PROPOSED] ORDER CONSOLIDATING *HOUSE* AND *OLIVER* ACTIONS

No. 4:20-cv-03919-CW

No. 4:20-cv-04527-CW

Facsimile: (312) 701 7711  
bmiller@mayerbrown.com  
mprovance@mayerbrown.com

Christopher J. Kelly (SBN 276312)  
MAYER BROWN LLP  
Two Palo Alto Square, Suite 300  
3000 El Camino Real  
Palo Alto, CA 94306  
Telephone: (650) 331-2000  
Facsimile: (650) 331-2060  
cjkelly@mayerbrown.com

Attorneys for Defendant The Big Ten  
Conference, Inc.

Dated: July 14, 2021

**ROBINSON BRADSHAW & HINSON, P.A.**

By: s/Robert W. Fuller

Robert W. Fuller (*pro hac vice*)  
Lawrence C. Moore, III (*pro hac vice*)  
Pearlynn G. Houck (*pro hac vice*)  
Amanda P. Nitto (*pro hac vice*)  
ROBINSON BRADSHAW & HINSON  
101 N. Tryon Street, Suite 1900  
Charlotte, NC 28246  
Telephone: (704) 377-2536  
Facsimile: (704) 378-4000  
rfuller@robinsonbradshaw.com  
lmoore@robinsonbradshaw.com  
phouck@robinsonbradshaw.com  
apickens@robinsonbradshaw.com

Mark J. Seifert (SBN 217054)  
Seifert Law Firm  
50 California Street, Suite 1500  
San Francisco, CA 94111  
Telephone: (415) 999-0901  
Facsimile: (415) 901-1123  
mseifert@seifertfirm.com

Attorneys for Defendant Southeastern  
Conference

Dated: July 14, 2021

**FOX ROTHSCCHILD LLP**

By: s/ D. Erik Albright

D. Erik Albright (*pro hac vice*)  
Gregory G. Holland (*pro hac vice*)  
230 North Elm Street, Suite 1200  
Greensboro, NC 27401  
Telephone: (336) 378-5368  
Facsimile: (336) 378-5400  
ealbright@foxrothschild.com  
gholland@foxrothschild.com

Jonathan P. Heyl (*pro hac vice*)  
FOX ROTHSCCHILD LLP  
101 N. Tryon Street, Suite 1300  
Charlotte, NC 28246  
Telephone: (704) 384-2625  
Facsimile: (704) 384-2800  
jhey@foxrothschild.com

Alexander Hernaez (SBN 201441)  
FOX ROTHSCCHILD LLP  
345 California Street, Suite 2200  
San Francisco, CA 94104  
Telephone: (415) 364-5540  
Facsimile: (415) 391-4436  
ahernaez@foxrothschild.com

Attorneys for Defendant Atlantic Coast  
Conference

Dated: July 14, 2021

**POLSINELLI PC**

By: s/ Leane K. Capps

Leane K. Capps (*pro hac vice*)  
Caitlin J. Morgan (*pro hac vice*)  
D. Rockwell Bower (*pro hac vice*)

JOINT STIPULATION AND [PROPOSED] ORDER CONSOLIDATING *HOUSE* AND *OLIVER* ACTIONS

No. 4:20-cv-03919-CW

No. 4:20-cv-04527-CW

2950 N. Harwood Street, Suite 2100  
Dallas, TX 75201  
Telephone: (214) 397-0030  
Facsimile: (214) 397-0033  
lcapps@polsinelli.com  
cmorgan@polsinelli.com  
rbower@polsinelli.com

Amy D. Fitts (*pro hac vice*)  
POL SINELLI, PC  
120 W. 12<sup>th</sup> Street  
Kansas City, MO 64105  
Telephone: (816) 218-1255  
afitts@polsinelli.com

Wesley D. Hurst (SBN 127564)  
POL SINELLI, PC  
2049 Century Park East, Suite 2300  
Los Angeles, CA 90067  
Telephone: (310) 556-1801  
whurst@polsinelli.com

Attorneys for Defendant The Big 12  
Conference, Inc.

**E-FILING ATTESTATION**

I, Steve W. Berman, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Steve W. Berman  
STEVE W. BERMAN

\* \* \*

**[PROPOSED] ORDER**

**PURSUANT TO STIPULATION,  
IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2021

---

THE HON. CLAUDIA WILKEN  
UNITED STATES DISTRICT JUDGE